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FILED

JUL 25 2017

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

CLERK U.S. DISTRICT COURT
WEST. DIST. OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

JOSHUA WILLIAMS

Criminal No. **17-195**
(18 U.S.C. §§ 2118(a) and 2119, and 21 U.S.C.
§§841(a)(1) and (b)(1)(C))

INDICTMENT

COUNT ONE

The grand jury charges:

On or about May 29, 2017, in the Western District of Pennsylvania, the defendant, JOSHUA WILLIAMS, did knowingly, intentionally and unlawfully take or attempt to take from the person or presence of another by force or violence or by intimidation any material or compound containing any quantity of a controlled substance belonging to or in the care, custody, control or possession of a person registered with the Drug Enforcement Administration under Title 21, United States Code, Section 822, that is, Rite Aid, located at 2270 Noblestown Road, Pittsburgh, Pennsylvania 15205, with intent to take a material or compound containing any quantity of a controlled substance, including but not limited to, oxycodone, vyvanse, amphetamine salts, methylphenidate, daytrana, dexamethylphenidate, concerta, hydromorphone, morphine, opana, oxymorphone, oxycontin, hysingla er, methadone, hydrocodone, Adderall, belladonna-opium, and fentanyl patches, each a Schedule II controlled substance, whose replacement cost to the registrant was not less than \$500.

In violation of Title 18, United States Code, Section 2118(a).

COUNT TWO

The grand jury further charges:

On or about May 29, 2017, in the Western District of Pennsylvania, the defendant, JOSHUA WILLIAMS, did knowingly, intentionally and unlawfully possess with intent to distribute a quantity of oxycodone, vyvanse, amphetamine salts, methylphenidate, daytrana, dexamethylphenidate, concerta, hydromorphone, morphine sulfate, opana, oxymorphone, oxycontin, hysingla er, methadone, hydrocodone, Adderall, belladonna-opium, and fentanyl patches, each a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT THREE

The grand jury further charges:

On or about May 29, 2017, in the Western District of Pennsylvania, the defendant, JOSHUA WILLIAMS, took a motor vehicle, namely a white 2014 Chevrolet Malibu, bearing Pennsylvania Registration JSL 8635, that had been transported, shipped, and received in interstate commerce, from the person or presence of another by force, violence, and intimidation, with the intent to cause death and serious bodily harm.

In violation of Title 18, United States Code, Section 2119.

FORFEITURE ALLEGATION

1. The allegations contained in Count Two of this Indictment are incorporated by reference as if fully set forth herein for the purpose of alleging criminal forfeiture pursuant to Title 21, United States Code, Sections 853(a)(1), 853(a)(2), and 853(p); and Title 28, United States Code, Section 2461(c).


2. As a result of the commission of the violations of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), charged in Count Two of this Indictment, the defendant, JOSHUA WILLIAMS, did acquire gross proceeds in United States currency and/or other items of value, thereby subjecting said proceeds to forfeiture to the United States of America pursuant to Title 21, United States Code, Section 853(a)(1).

3. If, through any act or omission by the defendant, JOSHUA WILLIAMS, any or all of the property and proceeds referenced in paragraph two above (hereinafter "the Subject Property"):

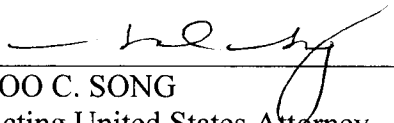
- a. Cannot be located upon the exercise of due diligence;
- b. Has been transferred, sold to, or deposited with a third person;
- c. Has been placed beyond the jurisdiction of the Court;
- d. Has been substantially diminished in value; or
- e. Has been commingled with other property which cannot be subdivided without difficulty,

the United States intends to seek forfeiture of any other property, proceeds, or funds of the defendant up to the value of the Subject Property referenced above pursuant to Title 21, United States Code, Section 853(p); and Title 28, United States Code, Section 2461(c).

A True Bill,



FOREPERSON



SOO C. SONG
Acting United States Attorney
DC ID No. 34524